

counsel filed in Related Actions,¹ Plaintiffs respectfully submit that the *Ericson* Action, along with the other Related Actions, should be consolidated into this consolidated action pursuant to the Court's December 23, 2011 Order [Dkt. #39].

The second related action is *Operating Engineers Construction Industry and Miscellaneous Pension Fund v. McClendon, et al.*, No. CIV-12-640-L, filed June 5, 2012 ("*OECIMPF* Action"). The *OECIMPF* Action is a putative securities class action alleging violations of federal securities laws *against Chesapeake* and certain of its officers and directors. Because this class action involves different claims, legal standards, and questions of law than the derivative actions, Plaintiffs believe that it is generally ill-suited for consolidation with the derivative actions.

Respectfully submitted this 11th day of June, 2012.

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¹ The Related Actions are: (i) *Deborah G. Mallow IRA SEP Inv. Plan v. McClendon, et al.*, No. CIV-12-436-M (W.D. Okla. filed Apr. 19, 2012); (ii) *Snyder v. McClendon, et al.*, No. CIV-12-437-M (W.D. Okla. filed Apr. 20, 2012); (iii) *Dolezal Family Ltd. P'ship v. McClendon, et al.*, No. CIV-12-477-M (W.D. Okla. filed Apr. 30, 2012); (iv) *Leonard v. McClendon, et al.*, No. CIV-12-479-M (W.D. Okla. filed Apr. 30, 2012); (v) *Shochat v. McClendon, et al.*, No. CIV-12-488-M (W.D. Okla. filed May 1, 2012); (vi) *David A. Kroll Emps.' Profit-Sharing Plan & Trust v. McClendon, et al.*, No. CIV-12-493-M (W.D. Okla. filed May 2, 2012); (vii) *Robaczynski v. McClendon, et al.*, No. CIV-12-501-M (W.D. Okla. filed May 3, 2012); (viii) *Spiegel v. McClendon, et al.*, No. CIV-12-502-M (W.D. Okla. filed May 3, 2012); (ix) *Rosengarten v. McClendon, et al.*, No. CIV-12-505-M (W.D. Okla. filed May 3, 2012); (x) *Alberts v. McClendon, et al.*, No. CIV-12-545-M (W.D. Okla. filed May 11, 2012); and (xi) *Gerber v. McClendon, et al.*, No. CIV-12-584-M (W.D. Okla. filed May 21, 2012).

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CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2012, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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